

ENGINEERING • SURVEYING • RESOURCES & ENVIRONMENTAL SERVICES

RESOURCE CONCEPTS, INC.

January 4, 2006

Mr. Brian Amme, EIS Project Manager
BUREAU OF LAND MANAGEMENT
Nevada State Office
1340 Financial Blvd.
P.O. Box 12000
Reno, NV 89520-0006

Incomplete version of
RMC-0061
(Also see EMC-0231)

Dear Mr. Amme:

Resource Concepts, Inc. (RCI) is submitting the enclosed comments regarding the DRAFT Vegetation Treatments Using Herbicides Programmatic EIS on behalf of the N-4 State Grazing Board. It is our hope that the BLM EIS preparation team will consider these comments when revising the Vegetation Treatment EIS for final publication.

The N-4 State Grazing Board has interest in the Vegetation Treatment EIS and the subsequent implications of the Record of Decision on public land livestock grazing programs and procedures as well as the Bureau's ability to conduct vegetation treatments as efficiently, effectively, and appropriately as possible. The following is a list of comments regarding the Vegetation Treatment EIS. Page numbers are included with each comment for ease of reference to specific points in the document. In general, Resource Concepts, Inc. supports the preferred alternative and we commend the BLM on completing a programmatic EIS that will allow the use of herbicides for treating vegetation throughout the Western United States.

1. Pg. 4-123 In the first full paragraph of the page, it is stated that spot treatments of vegetation could be applied at any time. Caution should be taken when treating vegetation adjacent to livestock water sources. Spot treatments should not be applied around water sources in pastures with limited water when livestock are grazing in the pasture. Instead, a standard operating procedure addition could include not allowing treatment of vegetation within close proximity to water sources (especially springs, tanks, ponds, and other developed water sources) while livestock are grazing in water, limited pastures.
2. Pg 4-123 In the fourth paragraph on this page, herbicide treatments are being proposed to reduce the risk of future catastrophic wildfire for weeds of concern including downy brome, Russian thistle, kochia, oak, and pinyon/juniper. Herbicide applications of tebuthiron or other herbicides could actually increase the risk of catastrophic wildfire. Leaving standing dead trees and tree branches on-site after application of herbicide treatment could result in higher quantities of low-moisture fuels that carry fire faster and hotter than live vegetation. Reducing the

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CARSON CITY OFFICE

340 N. Minnesota Street • Carson City, NV 89703
office: 775-883-1600 • fax: 775-883-1656

www.rci-nv.com

ZEPHYR COVE OFFICE

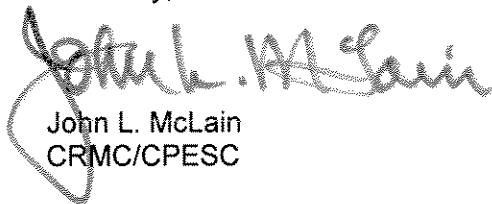
P.O. Box 11796 • Zephyr Cove, Nevada 89448
office: 775-588-7500 • fax: 775-589-6333

percentage of live pinyon and juniper trees in an area through chemical treatment should result in less competition for native grass and forb species, which is a benefit of treatment. However, increases in grass, forb, and shrub fuels are expected and can negate the supposed "fuel reduction" purpose behind the treatment.

3. Pg 4-126 In the paragraph concerning diquat, it was stated that the chemical could be of most concern if used in riparian areas where livestock are exclusively grazing. The document goes on to state that the unlikely scenario of this happening was not modeled. It should be a standard operating procedure, or part of the regulated use on diquat, that diquat will not be used in a riparian pasture while livestock are held in the same riparian pasture. Grazing duration is generally short in most riparian pastures and should allow sufficient time for livestock to be removed from the pasture before diquat treatments are applied.

In summary, Resource Concepts, Inc. appreciates the opportunity to review the BLM Vegetation Treatment Programmatic Environmental Report and provide comments on behalf of the N-4 State Grazing Board. We are available to discuss any of the concerns or comments outlined in this correspondence.

Sincerely,



John L. McLain
CRM/CPESC

JLM:sta